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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH

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Criminal Productions, Inc.

Plaintiff,

v.

Darren Brinkley,

Defendant.

Case No. 2:17-cv-00550-DBP

Magistrate Judge Dustin B. Pead

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**DEFENDANT'S FIRST SET OF INTERROGATORIES TO PLAINTIFF**

Darren Brinkley ("Defendant" or "Brinkley") pursuant to Fed. R. Civ. P. 26 and 33, propounds his First Set of Interrogatories as follows:

**INSTRUCTIONS**

1. **Scope.** Please produce any non-privileged matter that is relevant to any party's claim or defense.

2. **Continuing in Nature.** All interrogatories shall be deemed continuing in nature so as to require supplemental production if further documents are obtained or discovered by Criminal Productions, Inc. ("Plaintiff") between the time it responds to these requests and the time of trial. Such additional or supplemental information shall be furnished to Defendant's attorneys within a reasonable time after it becomes known or is obtained.

3. The answer to each interrogatory shall include all knowledge of Plaintiff that is within its custody, possession or control, including, but not limited to, knowledge and documents in its custody, possession, or control or that of associated, contractual, or related organizations or that of those under common control, predecessors in interest, consultants, accountants, attorneys, employees, and other agents. Where facts set forth in answer or portions thereof are supplied upon information and belief rather than actual knowledge, Plaintiff should so state and

specifically describe or identify the source or sources of such information and belief. Should Plaintiff be unable to answer any interrogatory or portion thereof by either actual knowledge or upon information or belief, describe the effort to obtain such information.

### **INTERROGATORIES**

**INTERROGATORY NO. 1:** Identify every individual who observed IP address 70.57.92.179 transmitting or receiving any portion of the movie *Criminal*.

**RESPONSE NO. 1:**

**INTERROGATORY NO. 2:** State the date and location of *Criminal*'s first public release.

**RESPONSE NO. 2:**

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**INTERROGATORY NO. 3:** Identify every company that receives and/or redistributes proceeds from distribution of Plaintiff's movie.

**RESPONSE NO. 3:**

DATED this 26<sup>th</sup> day of March, 2018.

HOOLE & KING, L.C.

/s/ Gregory N. Hoole  
Gregory N. Hoole  
Attorneys for Defendant Darren Brinkley

LISA L. CLAY, ATTORNEY AT LAW

/s/ Lisa L. Clay  
Lisa L. Clay, pro hac vice  
Attorney for Defendant Darren Brinkley